

# STATE OF COLORADO

Bill Owens, Governor  
Jane E. Norton, Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*

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Colorado Department  
of Public Health  
and Environment

May 24, 2002

Joseph A. Legare, Assistant Manager  
Environment & Stewardship  
U S Department of Energy, RFFO  
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Golden, Colorado 80403-8200

Stephen Nesta, Environmental Manager  
Remediation, Industrial D&D, & Site Services  
Kaiser-Hill Company, L L C  
10808 Highway 93, Unit B, Building 116  
Golden, Colorado 80403-8200

**RE: Conditional Approval of Closure Description Document (CDD) for Partial Closure of RCRA Unit 374.3 – the 400 Area Process Waste Transfer System at the Rocky Flats Environmental Technology Site (RFETS)**

Dear Mr. Nesta and Mr. Legare

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has received your notice of intent to partially close RCRA Unit 374.3 and has reviewed the *Closure Description Document (CDD) for the Partial Closure of Unit 374.3 – the 400 Area Process Waste Transfer System*. The Division received this CDD from DOE and Kaiser-Hill on or about April 24, 2002 with a cover letter dated April 22, 2002. This CDD applies to a portion of Unit 374.3 known as the "400 Area Process Waste Transfer System" which includes the process waste line connecting valve vault 13 to valve vault 14, valve vaults 14 through 20, all process waste lines between valve vaults 14 through 20, and all process waste lines originating from Buildings 122, 428, 443, 444, 447, and 460. Building 428 itself and Tank D-853 located within are not included within the scope of this CDD as stated in an e-mail message dated April 8, 2002 from Todd Billmire of Kaiser-Hill's RISS Project.

On or about March 22, 2002, the Division received from RFETS a draft Notification #02-06 to invoke the *Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation* at IHSS Group 400-7 ("ER RSOP Notification #02-06"). ER RSOP Notification #02-06 also describes closure activities that are planned for the 400 Area Process Waste Transfer System. However, neither the CDD nor the ER RSOP Notification described how these overlapping closure activities related to

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registered professional engineer (P E ) in accordance with the requirements of the approved Closure Plan and Section 264 115 of the Colorado Hazardous Waste Regulations (6 CCR 1007-3) The certification of closure may be submitted for either a partial closure of a unit or when an entire unit has been completely closed Regardless of when the certification of closure is prepared and submitted, it is expected that the certifying P E will be involved in the closure process to the extent necessary to adequately certify closure

If you have any questions concerning these matters, please contact James Hindman at (303) 692-3345

Sincerely,



Joe Schieffelin, Unit Leader  
Hazardous Waste Compliance Unit

cc S MacLeod, DOE-RFFO  
S Tower, DOE-RFFO  
D Shelton, Kaiser-Hill  
M Aguilar, USEPA Region VIII  
T Rehder, USEPA Region VIII  
D Miller, AGO  
S Gunderson, CDPHE-HMWMD  
D Kruchek, CDPHE-HMWMD  
S Tarlton, CDPHE-HMWMD  
Administrative Record, RFETS Bldg T-130G



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each other. On May 22, 2002 the Division received an e-mail message from Alec Cameron of Kaiser-Hill's RISS Project clarifying the relation between these two documents for activities planned for the 400 Area Process Waste Transfer System. According to the May 22, 2002 e-mail message, the decontamination activities described in the CDD for the 400 Area Process Waste Transfer System will be attempted first. If the decontamination method does not meet the closure performance standard or if the method is determined to not be economically feasible, then the system will be closed by the Environmental Restoration (ER) Project in accordance with the activities described under ER RSOP Notification #02-06.

The components of the RCRA unit described by this CDD will be closed by the method described as "Clean Closure by Decontamination" in Section X (Closure Plan) of the RFETS RCRA Permit No. CO-97-05-30-01. In accordance with Permit Condition X B 3 of the RFETS RCRA Permit No. CO-97-05-30-01, the Division hereby approves this CDD for the portion of Unit 374.3 known as the "400 Area Process Waste Transfer System" as described therein, with the following conditions:

1. Prior to conducting decontamination activities on any portion of double-walled piping within the 400 Area Process Waste Transfer System, the respective pipeline must be evaluated to determine if there have been any known releases from the primary pipeline (i.e., inner pipeline) to the secondary containment pipeline (i.e., outer pipeline) by reviewing documentation and any other known sources of such information for the unit. If this evaluation reveals that a release has occurred, then the Division must be notified prior to conducting the work and information must be provided to the Division describing how closure activities will proceed for that portion of the system. If the evaluation determines that no known releases have occurred from the primary pipeline, then closure activities may proceed. However, for each portion of piping being decontaminated, the leak detection system must be visually monitored to determine if the primary pipeline is leaking. If leaks from the primary pipeline are detected, then decontamination activities must stop for that portion of the system and the Division must be notified and provided with plans describing how closure activities will proceed for that portion of the system. Unless otherwise directed by the Division, decontamination activities may recommence within two working days of providing the notification and plans to the Division.
2. Since this CDD does not include a soil contamination evaluation for the 400 Area Process Waste Transfer System, it is assumed that soils and possibly groundwater in the vicinity of the unit will be evaluated by ER. Otherwise, the CDD will need to be amended to include a soil contamination evaluation.
3. Although not required for a RCRA closure, it is assumed that additional parameters (e.g., radiological contaminants, beryllium) will be evaluated in order to determine whether or not there are other contamination issues per the Rocky Flats Cleanup Agreement (RFCA). It is expected that such an evaluation will occur in accordance with the consultative process described in RFCA.
4. In order for the Division to accept the complete or partial closure of any unit or portion thereof that remains after closure, a certification of closure must be submitted to the Division. The certification of closure will need to be signed by the facility and by an independent Colorado